

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JO LOUISE PADAL,)
)
Plaintiff,)
)
v.) Case No. 08 C 892
) Judge Guzman
INGRAM ENTERTAINMENT, INC.,) Magistrate Judge Keys
)
Defendant.)

JOINT PROPOSED DISCOVERY PLAN

NOW COME the Parties, by and through their attorneys, and respectfully submit their Joint Proposed Discovery Plan pursuant to this Court's standing order.

1. Plaintiff in this case claims in a two-count Complaint that Defendant discharged her in violation of the Americans with Disabilities Act, 42 U.S.C. §12101, *et seq.* ("ADA") and the Age Discrimination in Employment Act, 29 U.S.C. §621 *et seq.* ("ADEA").

2. Counsel for the Parties met by telephone for a Rule 26(f) conference on May 19, 2008 to discuss the nature and basis of their claims and defenses, and the possibilities for a prompt settlement or resolution of the case. Pursuant to this conference, the Parties are currently engaged in settlement negotiations, and recommend the following discovery plan:

- a. Rule 26(a)(1) disclosures to be exchanged on or before June 25, 2008.
- b. All discovery to close on or before March 2, 2009.
- c. Dispositive motions to be filed on or before April 17, 2009; response briefs to be filed on or before May 29, 2009; and reply briefs to be filed on or before June 30, 2009.

WHEREFORE, the Parties respectfully request that this Honorable Court enter the above dates in this case and set this matter for status for a date at the Court's convenience.

Dated: May 23, 2008

Respectfully submitted,

JO LOUISE PADAL

INGRAM ENTERTAINMENT, INC.

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CERTIFICATE OF SERVICE

Clifford R. Perry III, an attorney, hereby certifies that he caused the Defendant's Joint Proposed Discovery Plan in the above-captioned matter to be served on the parties of record listed below via Electronic Filing to be served on Jeffrey S. Marks and Terry D. Slaw, through the U.S. District Court, Northern District of Illinois e-filing system on this 23rd day of May 2008, addressed to:

Jeffrey S. Marks
jmarks@ashiflaw.com

Terry D. Slaw
Tds_60062@hotmail.com

/s/ Clifford R. Perry III
Clifford R. Perry III